

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

OFFICE OF THE SECRETARY

In the Matter of )  
Billed Party Preference )  
of 0+ InterLATA Calls )

CC Docket No. 92-77

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Federal Communications Commission  
Office of the Secretary

REPLY COMMENTS

GTE Service Corporation and its affiliated domestic telephone operating companies ("GTE") hereby submit the following reply to the comments filed regarding proprietary calling cards and 0+ access presented for expedited consideration in the above referenced Notice of Proposed Rulemaking ("NPRM" of "Notice"), FCC 92-169, released May 8, 1992.

In this Notice, the Commission is considering an alternate routing methodology known as Billed Party Preference ("BPP") for 0+ interLATA payphone traffic along with other types of operator-assisted interLATA traffic. In this initial expedited pleading cycle, interested parties have filed comments on whether the Commission should require Interexchange Carriers ("IXCs") to share their billing and validation data for any calling cards usable with 0+ access, before the implementation of BPP, or restrict the use of proprietary cards to access code calling.

GTE previously stated that it does not support either of the interim solutions proposed. Industry resources would be more wisely spent concentrating on the long-term BPP proposal. GTE responds further as the issues relate to the Local Exchange Carriers ("LECs").

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## DISCUSSION

The cost and the timing of the interim solution to BPP makes it prohibitive.

GTE discussed the various outcomes which could result if the Commission requires AT&T to release billing and validation information for its proprietary card. According to AT&T, at 5, "there is no circumstance in which AT&T could envision making its calling card data available for validation and billing by its [Operator Service Provider] competitors." Thus, the only other option if the Notice were implemented would be for the AT&T proprietary card to be offered through the use of access code dialing. GTE opposes restricting the AT&T proprietary calling card to access code dialing since it would require costly and time consuming enhancements to the network. As explained in GTE's Comments, the network would have to be expanded so that GTE could block 0+ calls and send 10XXX 0+ to AT&T on separate trunk groups.

Some parties who support the proposal that AT&T open its billing and validation data to all IXCs do not discuss this technical aspect. Rather they focus on a plan which they perceive is "simpler and consumer friendly." See, e.g., Zero Plus Dialing, Inc. ("ZPDI") at 13. Even if this would increase options for the consumer, the Commission must consider the technical modifications which would be needed to implement the interim plan within a short time frame.

US West, at 7, expresses it precisely when it states that this proposal is "an inefficient and unnecessary expenditure of resources without commensurate end user benefits." In addition, Southwestern Bell, at 5, finds that "[t]he implementation period for this concept would equal or exceed the period required for development of BPP." Southwestern Bell also discusses the need for "specially designed Signaling System Seven ("SS7") -- between LEC end-

offices and IXC operator services switches -- for processing operator service calls." AT&T also raises an SS7 issue, at 8, stating that "[s]tandardization of the SS7 protocol to provide such information is currently under consideration, but even if those standards are eventually adopted it would take several years for LECs to deploy that capability and IXCs to modify their operator systems to function with it." GTE agrees that the proposal raises additional technological requirements. Thus, when considered from a technical vantage, the interim solution proposed in the NPRM is not a viable alternative to BPP.

LECs should be permitted to continue their arrangement with AT&T for the validation of the proprietary card for intraLATA calls.

With regard to IXC proprietary cards, a few parties suggest that if AT&T, and any other IXC, wishes to issue a proprietary card that the card should be restricted so that the LEC could not accept the card. In other words, these parties believe that "LECs should also be precluded from access to validation and billing for proprietary cards issues by an IXC." ZPDI at 7 Advanced Telecommunications Corporation ("ATC"), at 3, also believes that GTE Airfone should also be excluded from what they see as a "discriminatory arrangement."

The arrangement the GTOCs have with AT&T differs from what is currently being proposed by the Commission. The existing contracts between the GTOCs and AT&T permit the GTOCs to accept and validate the AT&T proprietary card as a means of payment for LEC services for the benefit of the GTOCs' customers. The GTOCs do not have access to AT&T's customer billing information. The bills are rendered by AT&T, but the charges are at the GTOCs' rates. Similarly, GTE Airfone's customers can use any of several proprietary cards to bill for the Airfone call. This differs significantly from the Commission's

proposal which would require AT&T to release the billing information and allow another carrier to bill the customer at that carrier's rates.

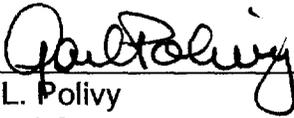
Thus, even if the Commission were to decide that proprietary cards are to be limited as proposed in the Notice, there is no reason not to permit the LECs to continue to accept an IXC's proprietary card for billing of the LEC's call.

CONCLUSION

For the foregoing reasons, the Commission should decline to adopt either of the interim solutions proposed in the NPRM. Instead, the Commission and the industry should concentrate their resources on implementing BPP as soon as possible.

Respectfully submitted,

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affiliated GTE domestic telephone  
operating companies

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June 15, 1992

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## Certificate of Service

I, Jennifer R. McCain, hereby certify that copies of the foregoing "Reply Comments Of GTE" have been mailed by first class United States mail, postage prepaid, on the 17th day of June, 1992 to the parties on the attached list:

  
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